

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ENOVSYS LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.,  
VERIZON BUSINESS NETWORK  
SERVICES, INC., VERIZON ENTERPRISE  
SOLUTIONS, LLC, CELLCO  
PARTNERSHIP D/B/A VERIZON  
WIRELESS, INC., VERIZON DATA  
SERVICES LLC, VERIZON BUSINESS  
GLOBAL, LLC, and VERIZON SERVICES  
CORP.,

Defendants.

Case No. 2:21-cv-00315-JRG-RSP

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL DEFENDANTS'  
PARTIAL MOTION TO DISMISS PLAINTIFF'S CLAIMS OF INDIRECT AND  
WILLFUL INFRINGEMENT**

Defendants Verizon Communications Inc., Verizon Business Network Services, Inc., Cellco Partnership d/b/a Verizon Wireless, Verizon Data Services LLC, Verizon Business Global LLC, and Verizon Services Corp. (collectively “Defendants”) file this unopposed motion to file their Partial Motion to Dismiss Plaintiff’s Claims of Indirect and Willful Infringement under seal.

Defendants’ motion discusses Exhibits G and H to the complaint, which Plaintiff has designated confidential and filed under seal pursuant to a prior order of this Court (Dkt. 21). As there is not yet a Protective Order entered in this matter to allow for under seal filings, Defendants respectfully file this motion for leave to do so. Plaintiff does not oppose the relief sought in this motion.

A proposed Order granting this unopposed motion is attached for the Court’s convenience.

Dated: November 4, 2021

Respectfully submitted,

By: /s/ Geoffrey M. Godfrey, with permission by  
Michael E. Jones

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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Defendants has complied with the meet and confer requirement in Local Rule CV-7(h). This motion is unopposed.

/s/ Michael E. Jones  
Michael E. Jones